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620 8th Avenue New York, NY 10018 nytimes.com Application GRANTED. The parties shall file a status letter by August 5, 2022.

April 20, 2022

Dated: April 21, 2022 New York, New York

VIA ECF

The Honorable Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

LORNA G. SCHOFIELD UNITED STATES DISTRICT JUDGE

Re: <u>The New York Times Company et al. v. United States Central</u> Command, No. 21-cv-08297

Dear Judge Schofield:

I am counsel for plaintiffs The New York Times Company and its reporter Charlie Savage (jointly, "The Times") in the above-captioned action brought pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. In this action, The Times seeks aerial footage of a strike conducted in Kabul, Afghanistan, on August 29, 2021. Pursuant to the Court's April 11 order (Dkt. No. 25), I submit this joint letter on behalf of all parties.

I write to advise the Court that the parties have reached an agreement on a schedule for defendant CENTCOM's processing of records responsive to The Times's FOIA request. On or before **Monday**, **August 1**, **2022**, CENTCOM will produce any and all nonexempt video footage responsive to the request.

The parties respectfully request permission to provide a status update on Friday, August 5, 2022, as to whether further proceedings will be necessary in the action.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)